

# **EXHIBIT C**

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**Discovery the Syracuse City School District has agreed to provide plaintiffs:**

1. All written policies related to the provision of education and special education and related services to 16- and 17-year-old inmates at the Justice Center, including but not limited to general education policies, special education policies and policies pertaining to the creation and distribution of cell study packets.
2. All educational records concerning the named Plaintiffs generated during the time that the Plaintiffs have been in the Justice Center, including but not limited to: attendance records, disciplinary records relating to the educational program, progress reports, graded and ungraded educational material (including cell packets), and correspondence with students and parents/guardians.
3. All educational records concerning T.S., K.D., A.G., C.C., R.P., and A.C. during their time at the Justice Center, including but not limited to: attendance records, disciplinary records relating to the educational program, progress reports, graded and ungraded educational material (including cell packets), and correspondence with students and parents/guardians.
4. All special education records concerning the named Plaintiffs and the individuals identified in paragraph 3 who are classified as students with disabilities under the IDEA, including but not limited to: any IEP's developed at the Justice Center, the most recent IEP developed prior to the student's incarceration at the Justice Center, Committee on Special Education meeting minutes for meetings held at the Justice Center, correspondence and prior written notices sent to parents/guardians while the student has been incarcerated, the most current evaluations of the student, notices concerning Manifestation Determination Reviews and meeting minutes for MDR's.
5. Education of Incarcerated Youth Program Plan submitted to the New York State Department of Education for the 2016-2017 school year.
6. A list of students eligible for receiving education at the Justice Center since October 2015; and a list of students at the Justice Center with IEPs since October 2015.
7. Contracts, agreements, memorandum of understanding, or other similar documents in effect between the Syracuse City School District and the Onondaga County Sheriff's Office relating to the provision of education at the Onondaga County Justice Center.